

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:19 CR 774 ERW NCC
)	
JORDAN PERRY,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jillian S. Anderson, Assistant United States Attorney for said District, and moves this Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The defendant is charged with one count of being a felon in possession of a firearm in violation of 18 U.S.C. §922(g)(1) and one count of being a domestic violence misdemeanor in possession of a firearm in violation of 18 U.S.C. §922(g)(9). Per 18 U.S.C. 3142(e)(1) and 3142(f)(1)(E), the undersigned respectfully requests a detention hearing as present indictment involves the defendant's possession of a firearm.

2. The facts underlying this case are also the subject of charges pending in the St. Louis County Circuit Court in cause no. 19SL-CR03920 in which the defendant is charged with felony assault 2nd of a special victim (a law enforcement officer), unlawful possession of a firearm and felony resisting arrest.

3. The facts giving rise to this case are as follows: On or about July 9, 2019, St. Louis County Officers attempted to make an arrest of the defendant who was known to be wanted for multiple felonies. The police had received a tip that he was at a residence in St. Louis County occupying a red Oldsmobile Alero. The defendant was found to be in the location provided and was found to be the sole occupant of a red Oldsmobile Alero. When law enforcement attempted to arrest the defendant, he fled and led the police on a vehicle and foot chase that lasted about seven minutes, after which the defendant was arrested. When he fled, he drove through the

yard of a residence directly toward a police officer who narrowly evaded being struck by the defendant. Further, the defendant fled in a reckless manner causing danger to others on the public streets. At the time of arrest, the defendant had exited his vehicle and was attempting to flee on foot. An officer stayed with the defendant's vehicle while other officers engaged the defendant in a foot pursuit. Through the open front driver's window, officers observed a grey revolver and three small clear plastic bags containing a white substance suspected to be crack cocaine in plain view on the driver's seat. The firearm was determined to be a loaded .22 caliber High Standard Double-Nine revolver. During an inventory search of the vehicle, a fourth small clear plastic bag was located that contained a substance also suspected to be crack cocaine. Ninety-one rounds of .22 caliber ammunition were also located in the defendant's vehicle.

4. At the time of this arrest, the defendant was had outstanding warrants for two felony cases from the St. Louis County Circuit Court: 18SL-CR05215, issued 6/29/2018, for felony possession of a controlled substance and 18SL-CR07908, issued 12/20/2018, for felony possession of a controlled substance and misdemeanor endangering the welfare of a child in the 2nd degree.

5. Additionally, the defendant has two misdemeanor convictions for domestic assault in the 3rd degree (1022-CR04757 and 1222-CR03965) from the St. Louis City Circuit Court and a conviction for felony endangering the welfare of a child in the 1st degree, felony resisting arrest, three counts of felony domestic assault 3rd degree and misdemeanor assault on a law enforcement officer (1422-CR02483).

WHEREFORE, due to the Defendant being a danger to the community as demonstrated by his criminal history, the facts and circumstances of the instant case, and any other relevant information the Government provides the court at a detention hearing, the Government respectfully requests that the Court order the defendant to be detained pending trial.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Jillian S. Anderson
JILLIAN S. ANDERSON, #53918MO
Assistant United States Attorney